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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH

This Document Relates to:

All Actions

**DECLARATION OF P. RYAN
BURNINGHAM IN SUPORT OF LEAD
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
MATERIALS RELATING TO LEAD
PLAINTIFF'S REPLY IN SUPPORT OF
HIS MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
PRIVILEGE LOG**

I, Ryan Burningham, hereby declare as follows:

1. I am an attorney in the law firm of Susman Godfrey, LLP. I am counsel for Lead Plaintiff Bradley Sostack. I am admitted *pro hac vice* to practice before this Court, and I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Lead Plaintiff's Reply in Support of His Motion to File Under Seal Materials Relating to Lead Plaintiff's Motion to Compel Production of Documents and Privilege Log.

3. The documents below contain and describe information that has been designated by Defendants as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the parties' Stipulated Protective Order. *See* ECF No. 120 at §§ 2(B), 2(G).

Documents to be Filed Under Seal	Line Nos. to be Redacted / Sealed in Full
Portions of Lead Plaintiff's Reply in Support of His Motion to Compel Production of Documents and Privilege Log	6:15-17 6:25-28 7:1-5
Burningham Decl. Exhibit 1 (RPLI_00302981)	Sealed in Full
Burningham Decl. Exhibit 2 (RPLI_00302989)	Sealed in Full
Burningham Decl. Exhibit 3 (RPLI_00303004)	Sealed in Full
Burningham Decl. Exhibit 4 (RPLI_00303011)	Sealed in Full
Burningham Decl. Exhibit 5 (RPLI_00303032)	Sealed in Full

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1st day of March, 2021, at Seattle, WA.

By: /s/ P. Ryan Burningham
P. Ryan Burningham

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2021, I electronically filed the foregoing document with the clerk of the Court and served counsel of record via the CM/ECF system.

/s/ P. Ryan Burningham

P. Ryan Burningham